

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

-against-

1:18-cr-00340 (LGS)

SOHRAB “Sam” SHARMA,
RAYMOND “Ray” TRAPANI,
and ROBERT “RJ” FARKAS,

Defendants.

-----X

**DECLARATION OF LAUREN BOWMAN IN SUPPORT OF DEFENDANT SOHRAB
“SAM” SHARMA’S MOTION *IN LIMINE* TO PRECLUDE THE GOVERNMENT
FROM OFFERING EVIDENCE OF UNCHARGED ACTS AND PRIOR
CONVICTIONS PURSUANT TO FEDERAL RULES OF EVIDENCE 404(b) AND 609**

I, Lauren Bowman, declare under penalty of perjury as follows:

1. I am a member of the law firm of Goodwin Procter LLP, attorneys for Defendant Sohrab Sharma in this action. I have personal knowledge of and am familiar with the facts and circumstances set forth herein by virtue of both my representation of Mr. Sharma and my review of the case file in this action.

2. Attached hereto as Exhibit A is a true and correct copy of a letter dated July 22, 2019 from Assistant U.S. Attorney’s Samson Enzer and Negar Tekeei to counsel for Mr. Sharma, notifying Mr. Sharma of evidence the Government expects to admit pursuant to Federal Rule of Evidence 404(b).

3. Attached hereto as Exhibit B is a true and correct copy of the Certificate of Disposition, No. 119951, for Mr. Sharma’s conviction for violation of Vehicle and Traffic Law Section §

1192.3, for *The People of the State of New York v. Sohrab Sharma*, (Dkt. No. 2016NY020228), dated October 7, 2019.

4. Attached hereto as Exhibit C is a true and correct copy of the Certificate of Disposition Indictment, No. 67505, for Mr. Sharma's conviction for violation of Penal Law § 210.15, for *The People of the State of New York v. Sohrab Sharma*, Case No. 03159-2017, dated October 8, 2019.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2019
New York, NY

/s/ Lauren Bowman
Lauren Bowman
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
(212) 813-8800
lb Bowman@goodwinlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 11, 2019, a true and correct of the forgoing was furnished by electronic delivery to all counsel of record.

/s/ Lauren Bowman
Lauren Bowman
Goodwin Procter LLP
620 Eighth Avenue
New York, NY 10018
(212) 813-8800
lbowman@goodwinlaw.com

Exhibit B

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK

CERTIFICATE OF DISPOSITION
NUMBER: 119951

THE PEOPLE OF THE STATE OF NEW YORK
VS

SHARMA, SOHRAB

Defendant

04/09/1991

Date of Birth

8043 BOCA REO DRIVE

Address

2276754L

NYSID Number

BOCA RATON

City

FL 33433

State Zip

03/25/2016

Date of Arrest/Issue

Docket Number: 2016NY020228

Summons No:

VTL 1192.3 03 UM, VTL 1192.1 01 I,
Arraignment Charges

Case Disposition Information:

<u>Date</u>	<u>Court Action</u>	<u>Judge</u>	<u>Part</u>
07/20/2017	PLED GUILTY & SENTENCE IMPOSED PG VTL 1192.3 03 UM \$1000 CONDITIONAL DISCHARGE=1Y COMMUNITY SERVICE=5D DRINKING DRIVER REFERRAL IID=1Y	STATSINGER, STEVEN M	JURY5
11/13/2017	EXECUTION OF SENTENCE PAID	CHU, P	ASC

I HEREBY CERTIFY THAT THIS IS A TRUE EXCERPT OF THE RECORD ON FILE IN
THIS COURT.

FANELLI, R

COURT OFFICIAL SIGNATURE AND SEAL

10/07/2019

DATE

FEE: 10.00

Marijuana convictions under PL 221.05 or PL 221.10 are vacated, dismissed and expunged as of August 28, 2019. The court system is in the process of updating its records, but in the meantime, it is an unlawful discriminatory practice unless specifically required or permitted by statute, for any entity to make any inquiry about an expunged conviction or to use an expunged conviction adversely, whether in any form of application or otherwise, against such individual.

Pursuant to section 70.15 of the Penal Law, any misdemeanor sentence with a jail term of "1 year", "12 months", or "365 days" is, by operation of law, deemed to be a sentence of 364 days. Any Certificate of Disposition indicating a jail sentence of "1 year", "12 months", "52 weeks", or "365 days" for a misdemeanor conviction shall be interpreted as a sentence of 364 days.

(CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT
SEAL OVER THE SIGNATURE OF THE COURT OFFICIAL.)

Exhibit C

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY
100 CENTRE STREET
NEW YORK, NY 10013

FEE:\$10.00

CERTIFICATE OF DISPOSITION INDICTMENT

DATE: 10/08/2019

CERTIFICATE OF DISPOSITION NUMBER: 67505

PEOPLE OF THE STATE OF NEW YORK
VS.

CASE NUMBER: 03159-2017
LOWER COURT NUMBER(S):
DATE OF ARREST: 10/10/2017
ARREST #: M17661346
DATE OF BIRTH: 04/09/1991
DATE FILED: 09/19/2017

SHARMA, SOHRAB

DEFENDANT

I HEREBY CERTIFY THAT IT APPEARS FROM AN EXAMINATION OF THE RECORDS ON FILE IN THIS OFFICE THAT ON 02/21/2018 THE ABOVE NAMED DEFENDANT WAS CONVICTED OF THE CRIME(S) BELOW BEFORE JUSTICE OBUS, M THEN A JUSTICE OF THIS COURT.

PERJURY 1st DEGREE PL 210.15 00 DF
PERJURY 1st DEGREE PL 210.15 00 DF

THAT ON 08/14/2019, UPON THE AFORESAID CONVICTION BY PLEA THE HONORABLE OBUS, M THEN A JUDGE OF THIS COURT, SENTENCED THE DEFENDANT TO

PERJURY 1st DEGREE PL 210.15 00 DF
\$ = \$5,000
COMMUNITY SERVICE = 50 HOUR(S)
PROBATION = 5 YEAR(S)

PERJURY 1st DEGREE PL 210.15 00 DF
COMMUNITY SERVICE = 50 HOUR(S)
PROBATION = 5 YEAR(S)

TOTAL FINE = \$5,000 (PAID)
CVAFF = \$25 (PAID)
DNA = \$50 (PAID)
SURCHARGE = \$300 (PAID)

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND AFFIXED MY OFFICIAL SEAL ON THIS DATE 10/08/2019.


COURT CLERK

Marijuana convictions under PL 221.05 or PL 221.10 are vacated, dismissed and expunged as of August 28, 2019. The court system is in the process of updating its records, but in the meantime, it is an unlawful discriminatory practice unless specifically required or permitted by statute, for any entity to make any inquiry about an expunged conviction or to use an expunged conviction adversely, whether in any form of application or otherwise, against such individual.

Pursuant to section 70.15 of the Penal Law, any misdemeanor sentence with a jail term of "1 year", "12 months", or "365 days" is, by operation of law, deemed to be a sentence of 364 days. Any Certificate of Disposition indicating a jail sentence of "1 year", "12 months", "52 weeks", or "365 days" for a misdemeanor conviction shall be interpreted as a sentence of 364 days.